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ISIS LOVECRUFT

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

PETER TODD, an individual,

Plaintiff,

vs.

SARAH MICHELLE REICHWEIN aka ISIS
AGORA LOVECRUFT, an individual,

Defendant.

Case No.: 4:19-cv-01751-DMR

**DECLARATION OF BRYCE WILCOX
IN SUPPORT OF SPECIAL MOTION TO
STRIKE, OR, ALTERNATIVELY,
MOTION TO DISMISS PLAINTIFF'S
COMPLAINT**

1 I, Bryce Wilcox, hereby declare:

2 1. My name is Bryce Wilcox. I am an adult individual over the age of 18. I live, work,
3 and reside in the State of Colorado. I have personal knowledge of the facts contained herein and,
4 if called as a witness, I could and would testify competently thereto.

5 2. I am a cryptographer and entrepreneur. I am also known in the field by the name
6 “Zooko.”

7 3. I am acquainted with both the plaintiff in this case, Peter Todd, and the defendant,
8 Isis Lovecraft.

9 4. On or about December 6, 2015, I was exploring Hong Kong at night with a group
10 of people including Mr. Todd when I observed him persistently pursuing a female friend of
11 mine, whom I will refer to as “My Friend” by following her around and getting close to her. It
12 was dark so I couldn’t see exactly what was happening, but based on her body language—
13 specifically the way she kept moving away from him—my sense was that she did not reciprocate
14 his interest. Soon, My Friend came up to me and whispered in my ear, saying that she was very
15 uncomfortable and asking if I could help her get out of the situation. She and some others then
16 went to the street to catch a cab to another destination. Mr. Todd followed her. When the cab
17 arrived, My Friend and others got inside. I could see that one seat remained, and Mr. Todd was
18 about to take it. So heeding My Friend’s request, I pushed past Mr. Todd and took the last
19 remaining seat next to her, and we left Mr. Todd behind to seek another taxi.

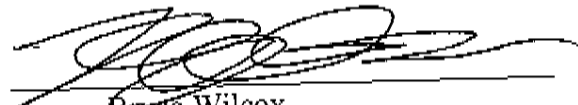
20 5. On or about July 10, 2017, I was visiting Isis Lovecraft in San Francisco when the
21 topic of Mr. Todd arose in conversation. Isis then told me that Mr. Todd had subjected Isis to
22 persistent and unwanted sexual advances. They (Isis) told me that after they had spurned his
23 advances, he started talking about them sexually in front of their peers, as if to intimidate them,
24 and saying that he was going to engage in rough sexual practices with them.

25 6. On or about February 10, 2018, I learned from another female friend of mine,
26 whom I will refer to here as “Jane Doe,” that Mr. Todd had pressured her into sex while she was
27 in a mentally compromised state due to a medical condition.
28

1 7. Soon afterward, I introduced and connected My Friend, Isis, and Jane Doe to one
2 another so that they could offer support to one another.

3 8. I swear under penalty of perjury that the foregoing is true and correct, except as to
4 any information stated on information and belief, and as to such information, I believe that it is
5 true.

6
7 Dated: July 13, 2019


Bryce Wilcox